

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN,)	
)	
Plaintiff,)	CIVIL ACTION
)	
vs.)	NO. 24 C 3299
)	
ESTATE OF JOANN EADS,)	JUDGE MARY M. ROWLAND
MICHELLE CASSADY, MARC EADS,)	
and MELISSA EADS,)	MAGISTRATE JUDGE MARIA VALDEZ
)	
Defendants.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiff, by its attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendants, MELISSA EADS, MARC EADS, ESTATE OF JOANN EADS, c/o MELISSA EADS, and ESTATE OF JOANN EADS, c/o MARC EADS, in the total amount of \$76,170.00, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$28,090.90.

On May 5, 2024, the Summons and Complaint was served on Defendants Melissa Eads and Estate of Joann Eads, c/o Melissa Eads (by tendering a copy of said documents to her personally) at her residence (copies of the Summonses and Affidavits of Service are attached hereto). Therefore, Defendant Melissa Eads and Estate of Joann Eads, c/o Melissa Eads' answers were due on May 28, 2025.

On July 2, 2024, the Summons and Complaint was served on Defendants Marc Eads and Estate of Joann Eads, c/o Marc Eads (by tendering a copy of said documents to him personally) at

his residence (copies of the Summonses and Affidavits of Service are attached hereto). Therefore, Defendant Marc Eads and Estate of Joann Eads, c/o Marc Eads' answers were due on July 23, 2025.

As Defendants, Melissa Eads, Estate of Joann Eads, c/o Melissa Eads, Marc Eads, and Estate of Joann Eads, c/o Marc Eads, have failed to timely answer the Complaint, Plaintiff respectfully requests entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Carson W. Fallo

Carson W. Fallo
Attorney for Plaintiff
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 1825
Chicago, IL 60606-5250
Bar No.: 6345253
Telephone: (312) 216-2550
Facsimile: (312) 236-0241
E-Mail: cfallo@baumsigman.com

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 7th day of February 2025:

Ms. Melissa Eads
2306 Francine Avenue
Joliet, IL 60436-1174

Mr. Marc A. Eads
11216 US Highway 52
Newark, IL 60541-9374

I further certify that on or before the hour of 5:00 p.m. this 7th day of February 2025, I electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the CM/ECF system, which will send notification to the following CM/ECF participants:

Mr. Thomas C. Cronin
Mr. Sean B. Crotty
Cronin & Co., Ltd.
120 N. LaSalle Street, 20th Floor
Chicago, IL 60602
tcc@cronincoltd.com
sbc@cronincoltd.com

/s/ Carson W. Fallo

Carson W. Fallo
Attorney for Plaintiff
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 1825
Chicago, IL 60606-5250
Bar No.: 6345253
Telephone: (312) 216-2550
Facsimile: (312) 236-0241
E-Mail: cfallo@baumsigman.com

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